Steel Hector & Davis

Tallahassee, Florida

Matthew M. Childs, P.A. (904) 222-4448

UNIGHAL FILE COPY

July 7, 1995

Blanca S. Bayó, Director Division of Records and Reporting Florida Public Service Commission 4075 Esplanade Way, Room 110 Tallahassee, FL 32399-0850

RE: DOCKET NO. 950001-EI

Dear Ms. Bayó:

Enclosed for filing please find the original and fifteen (15) copies of Florida Power & Light Company's Issues and Positions in the above referenced docket.

Also enclosed is a formatted double sided high density 3.5 inch diskette containing the List of Issues and Positions for Florida Power & Light Company.

| APP | - | | | | |
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Very truly yours,

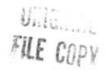
Matthew M. Childs, P.A.

DOCUMENT NUMBER - DATE

4000 Southeast Financial Center Miami, FL 33131 - 2398 (305) 577 - 7000 Fax: (305) 358 - 1418

0645 | JUL -7 1900 Philips Point West 177 South Ragter Drive West 177 South Ragter Drive West Palm Beach, FL 33401-6196 (407) 650-7200 FPSC-RECORDS/REPORT (1907) 655-1509

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION



IN RE: Investigation Of Fuel)
Cost Recovery Clauses Of)
Electric Companies

DOCKET NO. 950001-EI

FILED: JULY 7, 1995

FLORIDA POWER & LIGHT COMPANY'S LIST OF ISSUES AND POSITIONS

FUEL ADJUSTMENT ISSUES

 What is the final fuel true-up amount for the period October 1, 1994 through March 31, 1995?

FPL: \$12,465,206 overrecovery

2. What is the estimated/actual fuel true-up amount for the period April 1, 1995 through September 30, 1995 based upon two months actual and four months revised estimates?

FPL: \$50,864,415 underrecovery.

3. What is the total fuel true-up to be collected during the period October 1, 1995 through March 31, 1996?

FPL: \$38,399,209 underrecovery.

- 4. What should be the effective date of the new fuel adjustment charge, oil backout cost recovery charge, conservation cost recovery charge, capacity cost recovery charge and environmental cost recovery charge for billing purposes?
 - PPL: The Company is requesting that these new charges become effective starting with meter readings scheduled to be read on or after October 1, 1995 (Cycle Day 3) and continue through March 31, 1996 (Cycle Day 2). Billing cycles may start before October 1, 1995, and the last cycle may be read after March 31, 1996, so that each customer is billed for six months regardless of when the adjustment factor became effective.
- 5. What is the appropriate levelized fuel adjustment factor for the period October 1, 1995 through March 31, 1996?

FPL: 1.769 cents/kwh is the levelized recovery charge.

6. What are the appropriate Fuel Cost Recovery Factors for each rate group?

FPL:

| GROU | P RATE SCHEDULE | AVERAGE FACTOR | FUEL RECOVERY LOSS MULTIPLIER | FUEL RECOVERY FACTOR |
|------|---|-------------------|----------------------------------|----------------------|
| Α | RS-1,GS-1,SL-2 | 1.779 | 1.00197 | 1.773 |
| A-1 | SL-1,OL-1 | 1.763 | 1.00197 | 1.766 |
| В | GSD-1 | 1.769 | 1.00196 | 1.773 |
| С | GSLD-1 & CS-1 | 1.769 | 1.00171 | 1.772 |
| D | GSLD-2,CS-2, OS-2 & MET | 1.769 | 0.99678 | 1.764 |
| E | GSLD-3 & CS-3 | 1.769 | 0.96190 | 1.702 |
| A | RST-1,GST-1 ON-PEAK OFF-PEAK | 1.812 1.754 | 1.00197 1.00197 | 1.815 1.757 |
| В | GSDT-1 ON-PEAK CILC-1(G) OFF-PEAK | 1.812 | 1.00196 | 1.815 1.757 |
| С | GSLDT-1 & ON-PEAK CST-1 OFF-PEAK | 1.812 1.754 | 1.00171 1.00171 | 1.815 1.756 |
| D | GSLDT-2 & ON-PEAK CST-2 OFF-PEAK | 1.812 1.754 | 0.99678 0.99678 | 1.806 1.748 |
| Е | GSLDT-3,CST-3 ON-PEAK CILC-1(T)&ISST- | | 0.96190 | 1.743 |
| | OFF-PEAK | 1.754 | 0.96190 | 1.007 |
| F | CILC-1(D)& ON-PEAK | 1.812 | 0.99827 | 1.809 |
| | ISST-1(D) OFF-PEAK | 1.754 | 0.99827 | 1.750 |

^{7.} What are the appropriate Fuel Cost Recovery Loss Multipliers for each rate group?

FPL: The appropriate Fuel Cost Recovery Loss Multipliers are provided in response to Issue No. 6.

CAPACITY COST RECOVERY ISSUES

 What is the final capacity true-up amount for the period October 1, 1994 through March 31, 1995?

FPL: \$4,856,873 overrecovery.

2. What is the estimated/actual capacity true-up amount for the period April 1, 1995 through September 30, 1995, based upon two months actual and four months revised estimates?

FPL: \$7,472,759 underrecovery.

3. What is the total capacity true-up amount to be collected during the period October 1, 1995 through March 31, 1996?

FPL: \$2,615,886 underrecovery.

4. What are the appropriate Capacity Cost Recovery Factors for each rate group?

FPL:

| RATE CLASS | CAPACITY RECOVERY FACTOR (\$/KW) | CAPACITY RECOVERY FACTOR (\$/KWH) |
|-------------|-------------------------------------|--------------------------------------|
| RS1 | | 0.00694 |
| GS1 | | 0.00680 |
| GSD1 | 2.54 | £ |
| OS2 | | 0.00473 |
| GSLD1/CS1 | 2.58 | - |
| GSLD2/CS2 | 2.59 | - |
| GSLD3/CS3 | 2.48 | _ |
| CILCD/CILCG | 2.58 | |
| CILCT | 2.48 | |
| MET | 2.68 | |
| OL1/SL1 | | 0.00192 |
| SL2 | | 0.00458 |
| | | |

| RATE CLASS | CAPACITY RECOVERY FACTOR (RESERVATION DEMAND CHARGE) (\$/KW) | CAPACITY RECOVERY FACTOR (SUM OF DAILY DEMAND CHARGE) (\$/KW) |
|------------|--|--|
| ISST1D | .33 | .15 |
| SSTIT | .31 | .15 |
| SST1D | .32 | .15 |

GPIF ISSUES

 What should the GPIF Rewards/Penalties be for the period of October 1, 1994 through March 31, 1995?

FPL: \$3,109,109 reward.

What should the GPIF targets/ranges be for the period of October 1, 1995 through March 31, 1996?

FPL:

| PLANT/UNIT | EAF | TARGET | (%) | HEAT | RATE | TARGET |
|-----------------|------|---------|-------|------|-------|--------|
| CAPE CANAVERAL | 1 | 91.1 | | | 9330 | |
| CAPE CANAVERAL | 2 | 90.8 | | | 9436 | |
| | | 87.7 | | | 7288 | |
| LAUDERDALE 5 | | | | | 7248 | |
| FORT MYERS 2 | | 94.1 | | | 9308 | |
| PORT EVERGLADE: | S 3 | | | | 9133 | |
| FORT EVERGLADE | | 96.0 | | | 9132 | |
| PUTNAM 1 | - | 96.0 | | | 8777 | |
| PUTNAM 2 | | 95.3 | | | 8596 | |
| ST. JOHN'S RIV | ER | | | | 9335 | |
| | | | | | 9279 | |
| TURKEY POINT 2 | | | | | 9524 | |
| TURKEY POINT 3 | | | | | 1087 | 4 |
| TURKEY POINT 4 | | 76.8 | | | 10913 | 2 |
| ST. LUCIE 1 | | 89.6 | | | 1082 | 8 |
| ST. LUCIE 2 | | 58.8 | | | 1085 | 6 |
| SCHERER 4 | | 96.0 | | | 9939 | |
| GPIF SYSTEM WE | IGHT | ED AVER | AGE I | HR | 9729 | |

OIL BACKOUT ISSUES

1. What is the final Oil Backout True-Up amount for the period October 1, 1994 through March 31, 1995?

FPL: \$6,647 underrecovery.

2. What is the estimated/actual Oil Backout True-Up amount for the period April 1, 1995 through September 30, 1995?

FPL: \$131,367 underrecovery.

3. What is the total Oil Backout True-Up amount to be collected during the period October 1, 1995 through March 31, 1996?

FPL: \$138,014 underrecovery.

4. What is the Projected Oil Backout Cost Recovery Factor that should be used by the Company for the period October 1, 1995 through March 31, 1996?

FPL: .013 cents/kwh.

COMPANY SPECIFIC FUEL ISSUE

- 1. Should FPL be allowed to recover through the Fuel Cost Recovery Clause the cost of implementing a change from an 18 month fuel cycle operation to a 24 month fuel cycle operation of St. Lucie Units 1 and 2?
 - FPL: Yes. FPL is requesting to be authorized to recover \$2.7 million in implementation costs associated with changing from an 18 month fuel cycle operation to a 24 month fuel cycle operation of St. Lucie Units 1 and 2. FPL proposes to recover these costs through the Fuel Cost Recovery Clause in 1998, the same time that the fuel savings are realized by the customers. FPL projects the fuel savings to be \$171 million through the year 2016. Recovery through the Fuel Cost Recovery Clause is consistent with Order No. 14546, issued on July 8, 1985 in Docket No. 850001-EI-B. These expenditures will result in significant fuel savings for FPL's customers and appear to be the type of a cost which the Commission contemplated being recovered through the clause. For these reasons, FPL believes that it is appropriate to bring this issue forward for Commission consideration and approval.

WITNESSES AND SUBJECT MATTER

| WITNESS | SPONSOR | SUBJECT MATTER | EXHIBIT TITLES |
|--|-------------------|---|-----------------|
| B. T. BIRKETT | FPL | Levelized Fuel Cost Recovery, Capacity Cost Recovery, and Oil Backout Cost Recovery Final True-Up October 1994 through March 1995 | Appendices I-IV |
| R. SILVA | FPL | GPIF (True-Up) October 1994 through March 1995 | Document 1 |
| R. SILVA C. VILLARD B. T BIRKETT | FPL FPL FPL | Levelized Fuel Cost Recovery, Capacity Cost Recovery, and Oil Backout Cost Recovery Factors for October 1995 through March 1996 | Appendices I-V |
| R. SILVA | FPL | GPIF (Projections) October 1995 through March 1996 | Document 1 |

Respectfully submitted,

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Attorneys for Florida Power
& Light Company

BY: Matthew M. Childs, P.A.

CERTIFICATE OF SERVICE DOCKET NO. 950001-EI

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's List of Issues and Positions have been furnished by Hand Delivery** or U.S. Mail this 7th day of July, 1995, to the following:

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